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COUNTY BY: 
2012 MAY 21 AM 10:27
SUE HALL, CLERK
APACHE COUNTY SUPERIOR COURT

...to do justly, to love mercy, and to walk humbly with God. Micah 6:8

**IN THE SUPERIOR COURT
IN AND FOR THE COUNTY OF APACHE, STATE OF ARIZONA**

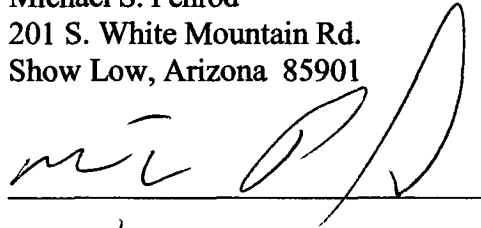
In re the matter of:)	
C.R.R.,)	CASE NO. JV 2008-065
A person under eighteen years of age)	
)	Response to the State's Motion to
)	Affirm Previous Treatment Order
)	and/or Modify Previous Detention
)	Order, Or In The Alternative Hold
)	a Detention Hearing On The
)	Pending Petition To Revoke
)	Probation
)	
)	

The Juvenile, through counsel, responds to the State's Motion. YDI has blatantly ignored this Court's order. Counsel requests the Court modify its previous order, ordering the juvenile back to YDI, and instead issue an order furloughing the juvenile to his paternal grandmother's custody in St. Johns. Counsel objects to the juvenile remaining in custody at the Apache County Juvenile Detention Facility simply because YDI is ignoring this Court's order. Simply put, the juvenile is being punished by remaining in custody because of YDI's refusal to accept the juvenile back for treatment. At this point, the juvenile has been in custody since Wednesday May 16, 2012 and this is well beyond the 24 hour time limit set forth in Rule 23(D) of the Arizona Rules of Procedure for the Juvenile Court. As such, a detention hearing is not appropriate and the juvenile must be released from the detention facility. Counsel requests that the juvenile

be immediately furloughed to his grandmother's custody and that YDI be ordered to show cause as to why it has failed to follow this Court's order.

RESPECTFULLY SUBMITTED the 18 day of May 2012, by:

Michael S. Penrod
201 S. White Mountain Rd.
Show Low, Arizona 85901

A handwritten signature in black ink, appearing to read 'mi P', is written over a horizontal line.

COPY of the foregoing handed/faxed/mailed this 18 day of May 2012, to:
Assigned Judge
Michael Whiting, Apache County Attorney's Office
Marsha Gregory, GAL
Steve Williams, Attorney for the Mother